

**UNITED STATES DISTRICT COURT
for the
Northern District of New York**

In the Matter of the Search of))
<i>(Briefly describe the property to be searched or identify the person by name and address)</i>))
	Case No. 8:18-MJ-690-2 (GLF)
INFORMATION ASSOCIATED WITH))
FACEBOOK USERNAME "Chris Terrance"))
PROFILE ID = 100009818194065 THAT IS))
STORED AT PREMISES CONTROLLED BY))
FACEBOOK.))

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property: (*identify the person or describe the property to be searched and its given location*):

See Attachment A

located in the Northern District of New York, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 2422(b)	Enticement and Coercion of a Minor and Attempted Enticement and Coercion of a Minor
18 U.S.C. § 2423(b) and (e)	Travel with Intent to Engage in Illicit Sexual Conduct and Attempted Travel with Intent to Engage in Illicit Sexual Conduct

The application is based on these facts:

See Attached Affidavit

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days):

is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

AO 106 (Rev. 04/10) Application for a Search Warrant (*Page 2*)



Applicant's signature

Special Agent Chad Willard, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: November 20, 2018



Judge's signature

City and State: Plattsburgh, NY

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE SEARCH OF

INFORMATION ASSOCIATED WITH
FACEBOOK USERNAME “Chris Terrance”
PROFILE ID = 100009818194065 THAT IS
STORED AT PREMISES CONTROLLED BY
FACEBOOK.

Case No. 8:18-MJ-690-2(GLF)

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Chad Willard, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain account, referred to herein as the “Subject Account,” that is stored at premises owned, maintained, controlled, or operated by Facebook, Inc., a provider of an electronic communications service headquartered 1601 Willow Road, Menlo Park, CA 94025. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook, Inc. to disclose to the government records and other information in its possession pertaining to the subscriber or customer associated with the listed account, including the contents of communications. The evidence and information to be searched for is described in the following paragraphs and in Attachment A, and includes items evidencing violations of **Title 18, United States Code, Section 2422(b)** (using a facility of interstate commerce to persuade, induce, entice, and coerce

and to attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense), **Title 18, United States Code, Sections 2423(b) and (e)** (travel and attempt to travel with intent to engage in illicit sexual contact), and **Title 18, United States Code, Section 1470** (transfer and attempt of obscene material to minor).

2. I am a Special Agent with Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), and have been so employed since August 6, 2006. I graduated from the Criminal Investigator Training Program and the ICE Special Agent Training programs at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA. I am currently assigned to the HSI resident agent in charge office in Massena, NY. I have participated in investigations involving fraud, alien smuggling, narcotics smuggling, child pornography and intellectual property rights. I have conducted or participated in surveillance, execution of search warrants and debriefing of subjects. I have received specialized training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography, as defined in Title 18 United States Code, Section 2256.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of **Title 18, United States Code, Sections 2422(b), 2423(b) and (e), and 1470** have been committed by CHRISTOPHER TERRANCE. There is also probable cause to believe that evidence of these violations, as more fully described

in Attachment B, will be found within the electronic communications held by the service provider described above.

PROBABLE CAUSE

5. Saint Regis Mohawk Tribal Police (SMRT) Patrolman Casey Jacobs has advised me that on July 3, 2018, a 41-year-old male (the “Complainant”) reported an endangering the welfare of child complaint to the Saint Regis Mohawk Tribal Police in Hogansburg, NY. The Complainant reported that on his 15-year-old daughter’s Facebook account he observed messages between his daughter (“Victim 1”) and an adult male identifying himself as CHRIS TERRANCE. The Complainant stated that the messages instantly made him angry in that he knew CHRIS TERRANCE and was upset that an older male was trying to have a conversation with Victim 1. The Complainant further stated that he co-signed a form allowing SMRT to assume the online identity of Victim 1’s Facebook page.

6. Victim 1 also provided a statement advising that on or about April 27, 2017, she received a message on Facebook Messenger App from a CHRIS TERRANCE. In the chat provided by Victim 1 it is clear that CHRIS TERRANCE knew that Victim 1 is 15 years old. The following table includes the date of the conversations and the substance:

Date	Conversation
6/30/17	TERRANCE: Hi. How old are you?
7/7/17	TERRANCE: No answer. Lol Victim 1: Sorry lol I just got fb don't really know how to use it

7/11/17	TERRANCE: New to fb?! Really! Lol. Still didn't answer my question tho Victim 1: I'm only 15 TERRANCE: Oh really? Hmm should not be talking then huh? Lol TERRANCE: Only 15 damn! Lol j/k Victim 1: [smiley face] well I'm about to go swimming lol TERRANCE: Wanna talk? I understand if not I'm quite a bit older. Haha geez feel like a creeper. Lol. I wanna go swimming! Victim 1: haha yeah since it's so hot outside it's gonna be nice TERRANCE: Yeah I'd love to go swimming with ya rite now. Gonna get myself in trouble. Bout to have your dad come in the store wanting to kick my ass. TERRANCE: I almost almost wanna ask to see your swimsuit. But I'm not.... Victim 1: wdym? TERRANCE: Mean about what?? Victim 1: I just didn't get what that meant
7/11/17 Continued	Victim 1: I just didn't get what that meant TERRANCE: Uhm meant about what? I said a few things Victim 1: The last one TERRANCE: Ohhh u said u was going swimming. I said I almost wanna ask if I could see your swimsuit. "u in it" lol sorry. TERRANCE: Yeah sorry..... ... TERRANCE: So how was the water? Victim 1: Okay TERRANCE: Okay? It wasn't absolutely refreshing an invigorating after such a hot day Victim 1: I guess [laughing emoji] TERRANCE: See now that's more like it. Such a pretty smile! [smiley emoji]
7/12/17	TERRANCE: Good morning
7/20/17	TERRANCE: Hi
8/2/17	TERRANCE: Hello
10/15/17	TERRANCE: Hi how's your weekend going?
11/15/17	TERRANCE: You looked really pretty today...
11/25/17	TERRANCE: What you doing tonight?
4/9/18	TERRANCE: Hello TERRANCE: Hello
6/27/18	TERRANCE: you glad to be done school

7. SRMTP obtained permission to assume Victim 1's Facebook account, and on July 3, 2018, Patrolman Jacobs began communicating with Terrance via Facebook as Victim 1. On that same day, TERRANCE asked Victim 1 if she ever "blazes," referring to smoking

marijuana. Then TERRANCE stated, “Oh gonna say maybe we could smoke sometime. Lol its ok.” Patrolman Jacobs as Victim 1 responded, “Idk I’d be afraid my dad would find out he’s always asking who I hang with, he’s always in my business.” TERRANCE replied, “That’s a good thing. Not for me lol. But maybe we could figure something out sometime?...” Patrolman Jacobs sent back a smiley face emoji to which TERRANCE replied, “Is that a yeah maybe?” Patrolman Jacobs as Victim 1 answered, “gotta go getting ready to leave. I’ve gotta be careful my parents wouldn’t approve of me talking to a older mature guy or really any other boy they don’t know about.”

8. On July 6, 2018, TERRANCE sent a message that said, “I really wanna get to know you. Maybe try to hang out sometime. But like I said nothing you’re not comfortable with. We can just keep talking im cool with that. So do I get your number when you get your new phone?” During the aforementioned conversations on Facebook, TERRANCE used Facebook account with **USERNAME “Chris Terrance” PROFILE ID = 100009818194065 (“the Subject Account.”)** On July 9, 2018, Patrolman Jacobs transitioned the conversation from Facebook to text messaging. That day, TERRANCE sent a text message to Patrolman Jacobs posing as Victim 1 that said, “Is this really you? Lol.” The conversation continued and TERRANCE asked Victim 1 if she was home alone and if she would like something from Tim Horton’s coffee shop. Patrolman Jacobs acting as Victim 1 stated that her parents wouldn’t approve of her having a boy over. TERRANCE responded, “You would be my angel (Kiss Emoticon) Well we’ll figure something out if you want to.” During this same conversation, Patrolman Jacobs acting as Victim 1 informed TERRANCE that Victim 1 is 16 years old.

9. On July 10, 2018, TERRANCE sent a photograph of himself to Victim 1. Then TERRANCE stated, “Sooo uhmmm what color panties you have on. I wanna rub you from head

to toe with warm massage oil. Mmmm tease me please Wait til O get to tease you baby mmmmm you're gonna love it, Just remember to relax n enjoy I'll take care of you. I wanna see you.”

10. Similarly, on July 15, 2018, TERRANCE sent a text message to Victim 1 which said, “So what color and kind of panties you wearing?” Patrolman Jacobs acting as Victim 1 responded, “Purple ones tonight.” TERRANCE replied, “Mmm show me! Cant wait to slowly pull em down n kiss you there! Mmmm.” Later in the conversation, TERRANCE sent a text message that said, “Text u when I get home. Im gonna come by your house to say hi in the morning It will be around 10 1030ish N give that booty a nice squeeze! Lol Mmmmmmm.” Patrolman Jacobs acting as Victim 1 responded, “not sure what my mom would think, she can b a hard ass on me sometimes. Can’t wait til I’m done w school so I can move out.” TERRANCE replied, “Hmm okay. We need to get together baby I wanna squeeze that booty so bad lol I get a lil hard just thinking of you.”

11. The next day, TERRANCE sent a text message to Victim 1 that said, “Soon baby Ima be all over you! But for now can I get a selfie sweetie? Cant wait to feel you n taste every inch of your sweet sexy body.” Patrolman Jacobs acting as Victim 1 responded, “Can’t wait for u to show me what u like.” TERRANCE stated, “Oh I will. You’ll like it too baby I love making my girl orgasm. You ever had one?” Patrolman Jacobs acting as Victim 1 responded, “You think it hurt the first time? U gonna get my v card lol.” TERRANCE stated, “It might. I’ll be as gentle as I can tho baby. Wanna make it good for you.” Later in the conversation, TERRANCE asked, “Should I get n carry some condoms?” Patrolman Jacobs acting as Victim 1 responded, “I don’t need to get pregnant the first time lol. Yess you’ll need them, I’m not buying them so that part up

2 you." TERRANCE answered, "Ok I got you. Not pregnant the first time ok how bout the second time! Lol."

12. From July 16, 2018 through August 1, 2018, SRMTP Patrolman Julie Smoke acted as Victim 1 in the text message conversations with TERRANCE. On July 20, 2018, TERRANCE and Patrolman Smoke acting as Victim 1 exchanged the following text messages:

TERRANCE: I jus got some things...lol

Victim 1: What did you get us

TERRANCE: [Sends a photograph of a 10 pack of Trojan Bareskin Latex Condoms]

TERRANCE: Yeah baby Im ready! Lol.

TERRANCE: But you're my only Angel Give it time sweetie we'll be on eachothers.

Victim 1: Really

TERRANCE: Yeah just can't be rite away. You'll get put in jail! Lol. Are you only mine?

Victim 1: Huh? Yes I'm urs

TERRANCE: Um underage. Get me put in jail...We have to keep us a secret for now.

We gonna see eachother as soon as we can. It jus has to be shh for now baby.

13. On July 24, 2018, TERRANCE and Patrolman Smoke acting as Victim 1 exchanged text messages including a text messages from TERRANCE which said, "I wanna slowly pull off those panties n spread them thick juicy thighs n slowly start licking and kissing your ripe sweet peach! Til you're moaning and squirming, trembling and begging me to stop! Gonna make you orgasm all over my tongue," followed by, "Then after you orgasm all over my tongue Im gonna kiss my way up your body n slowly slide my big hard dick deep inside your tight juicy peach!"

14. On July 26, 2018, TERRANCE sent a text message to Victim 1 indicating that he took a picture for her. TERRANCE stated, "Yeah just cropped it its only half of it..." and then sent a picture of an adult male's erect penis that had been cropped to only show the top half.

15. On August 1, 2018, TERRANCE sent a photograph of himself to Victim 1. Throughout that day, TERRANCE and Patrolman Smoke acting as Victim 1 exchanged the following text messages in which they arranged to meet:

TERRANCE: I know its early but what time you think we can get together

Victim 1: Ummm IDK I'm spending the night...

TERRANCE: Yeah so are we gonna b able to see each other? Are you gonn abe able to get out??

Victim 1: Yeah she's havin a small party so I can leave 4 a few

TERRANCE: Oh ok so wheres my smiling angel photo?

...

TERRANCE: Soooo EXCITED!

TERRANCE: Hello

TERRANCE: But oh soo nervous

TERRANCE: [kissing face]

Victim 1: I think we both r [kissing face]

TERRANCE: Yes we are. What are you wearing?

Victim 1: U will have to wait n see

TERRANCE: Okay...

...

TERRANCE: Think it will be better if we meet early or late?

Victim 1: what time is early

TERRANCE: Oh Idk early in the night or late tonight you tell me

Victim 1: I'm not goin over til later sooo I can txt u

TERRANCE: Ok sounds good

Victim 1: Bring some drinks?

TERRANCE: Maybee

Victim 1: [kissing face]

TERRANCE: Idk you're to young to b drinkn lol

Victim 1: ;) lol

TERRANCE: No perfume

Victim 1: Y

TERRANCE: Cant go home smelling your perfume

...

Victim 1: Goin 2 my friends where u wanna meet later?

TERRANCE: Idk. Text you in a bit....after I get my picture...lol

TERRANCE: So when would it b to late to pick u up. Hello

Victim 1: Sorry.. Wat times good for u? I'm sleeping over

TERRANCE: Maybee between 10 11...I want a pic first! Lol ;) [kiss face] [kiss face]

TERRANCE: Unless you don't wanna...

Victim 1: Don't wanna wat?

TERRANCE: Hang out

Victim 1: Yea I do I'm just nervous

TERRANCE: Me too. We don't have to do anything at all hang out drive around...or we don't have to hang out its on you

TERRANCE: Hmm

Victim: [Photograph of Victim 1]¹ I didn't get dressed up 4 nothing ;) [kiss face]

TERRANCE: Oh baby!!!! [emojis]

¹ This photograph was sent with the permission of Victim 1 and Victim 1's parents.

TERRANCE: Where are we gonna meet? Or how we doing this...

Victim 1: One of my friends can drop me off at western door or twinleaf

TERRANCE: Oh ok...

TERRANCE: No condoms tonight

Victim 1: Lame

TERRANCE: Oh really? What if I meant I jus wasn't gonna use one? Hmmm? Lol ;)

Victim 1: Hmm... IDK what I would say or do

TERRANCE: Lol. Probly love it n end up carrying my bb...lo

Victim 1: OMG guess that could happen lol.

TERRANCE: Yeah probly unless I finished someplace else... ;)

...

TERRANCE: So this is really happening? Or m I gonna get there and be rushed by the police?

16. The conversation continued and they agreed to meet at Tim Horton's in Hogansburg, New York that night. Hogansburg is in Franklin County in the Northern District of New York.

17. Patrol units from SRMTP surveilled Tim Horton's after a text message was sent to TERRANCE stating Victim 1 was inside Tim Horton's waiting for him. TERRANCE arrived and SRMTP arrested him. Prior to placing TERRANCE in SRMTP's patrol car, officers conducted a pat down of his person. They found three condoms in TERRANCE's front pocket.

18. TERRANCE was transported to the SRMTP office for an interview. He waived his *Miranda* rights. During the interview, TERRANCE stated he left his home in Snye, Quebec and traveled into the United States to meet Victim 1 at Tim Horton's. He stated he knew that Victim 1 was 16 years old and he admitted to purchasing the condoms found in his pocket that night.

19. Based on the foregoing, I believe there is probable cause that evidence of violations of **Title 18, United States Code, Section 2422(b), 2423(b) and (e), and 1470** will be found within the content of the Subject Account.

FACEBOOK, INC.

20. I have also learned that Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

21. Facebook asks users to provide basic contact information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

22. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, to all Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

23. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a

“Mini-Feed,” which highlights information about the user’s “Friends,” such as profile changes, upcoming events, and birthdays.

24. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

25. Facebook has a Photos application, where users can upload an unlimited number of albums and photos. Another feature of the Photos application is the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, a user’s “Photoprint” includes all photos uploaded by that user that have not been deleted, as well as all photos uploaded by any user that have that user tagged in them.

26. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient’s “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile.

27. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs (“blogs”), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.

28. The Facebook Gifts feature allows users to send virtual “gifts” to their friends that appear as icons on the recipient’s profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other “pokes,” which are free and simply result in a notification to the recipient that he or she has been “poked” by the sender.

29. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

30. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user’s access or use of that application may appear on the user’s profile page.

31. Facebook uses the term “Neoprint” to describe an expanded view of a given user profile. The “Neoprint” for a given user can include the following information from the user’s profile: profile contact information; Mini-Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook group identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications.

32. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user’s IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

33. Social networking providers like Facebook typically retain additional information about their users’ accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their account, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider’s support services, as well records of any actions taken by the provider or user as a result of the communications.

34. Therefore, the computers of Facebook are likely to contain all the material just described, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and account application.

**INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED FROM
SERVICE PROVIDER**

35. I anticipate executing the warrant on Facebook under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies

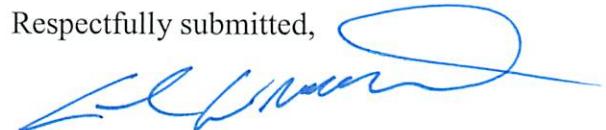
of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B from Facebook, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

36. Based on the forgoing, I request that the Court issue the proposed search warrant.

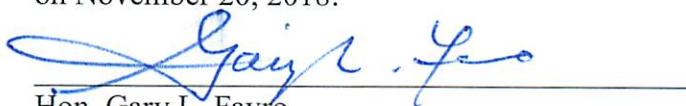
37. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i). Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of those warrant.

Respectfully submitted,



Chad J. Willard
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me
on November 20, 2018:



Hon. Gary L. Favro
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A
Property to Be Searched

This warrant applies to information associated with the Facebook USER ID **100009818194065** that is stored at premises owned, maintained, controlled, or operated by Facebook, Inc., a provider of an electronic communications service headquartered 1601 Willow Road, Menlo Park, CA 94025

ATTACHMENT B
Particular Things to be Seized

I. Information to be disclosed by FACEBOOK, INC.

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

- (a) All contact information, including full name, user identification number, birth date, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- (b) All Photoprints, including all photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them;
- (c) All Neoprints, including profile contact information; Mini-Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;
- (d) All other communications and messages made or received by the user, including all private messages and pending "Friend" requests;
- (e) All IP logs, including all records of the IP addresses that logged into the account;

- (f) All information about the user's access and use of Facebook Marketplace;
- (g) The length of service (including start date), the types of service utilized by the user, and the means and source of any payments associated with the service (including any credit card or bank account number);
- (h) All privacy settings and other account settings;
- (i) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.
- (j) All unified message threads and records (including, but not limited to, current thread participants, past thread participants, and subscriber events)
- (k) Records of any Facebook accounts that are linked to the above-identified account(s) by **machine cookies** (meaning all Facebook user IDs that logged into Facebook by the same machine or device as the account); and
- (l) Any **push tokens** or device tokens maintained for the account (meaning the authentication code assigned to validate an Application [or "App"] when it is downloaded and being used to communicate with third-party vendors).

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of **Title 18, United States Code, Section 2422(b), Title 18, United States Code, Sections Title 18, United States Code, Sections 2423(b) and (e), and Title 18, United States Code, Section 1470**, or the attempt to commit any of these offenses, including, for the account listed on Attachment A, chats, correspondence, contacts, images, and any other information pertaining to the following matters:

1. Using a facility of interstate commerce to persuade, induce, entice, coerce, and attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense;
2. Evidence of the transmission or receipt through interstate or foreign commerce, of any visual depictions of sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, regardless of the age of the subject of the image (including the transmission of obscene material to minors in violation of Title 18, United States Code, Section 1470);
3. Evidence of communication with any minor or minors, information that would assist in identifying those minors, including any images and photographs of children that are not sexually explicit, and any and all child erotica;
4. Any textual descriptions of sexually explicit conduct with minors; and
5. Records relating to who created, used, or communicated with the account or identifier, including records about their identities and whereabouts.